

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

CHERYL SAGATAW and
DEANTHONY BARNES, *on behalf of
themselves and a class of
similarly-situated individuals,*

Plaintiffs,

vs.

MAYOR JACOB FREY, *in his
individual and official capacity,*

Defendant.

Civil Action No.
0:24-cv-00001-ECT/TNL

**DECLARATION OF CLAIRE
GLENN IN SUPPORT OF
COMPLAINT AND MOTION
FOR TEMPORARY
RESTRAINING ORDER**

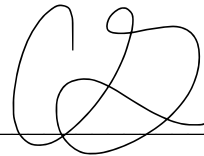
DECLARATION OF CLAIRE NICOLE GLENN

I, Claire Nicole Glenn, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Claire Nicole Glenn and I am 35 years old.
2. On January 1, 2024, I called the Hennepin Shelter Hotline at 612-204-8200 at approximately 10:40 A.M. and 10:47 A.M. An automated message stated that the Hotline was closed until 1:00 P.M. for the holiday and that I would be redirected to “United Way 211.”
3. Both times, I was transferred to United Way 211 and, when prompted, provided my zip code (55407). After a brief hold, a “211 Community Resource Specialist” answered. I spoke with two different “Community Resource Specialists” during these two calls. Both times, I asked how many shelter beds were available and they said they did not have that information—I would need to call back after 1:00 P.M.
4. On January 1, 2024, I called the Hennepin Shelter Hotline again at 1:27 P.M. Instead of being transferred to United Way 211, I was provided a menu of options. I selected the option for housing information for adults. I waited on hold for several minutes, and the call was disconnected inadvertently due to my Bluetooth connection. I called back at 1:32 P.M. and had the same Bluetooth/technical issue and the call dropped.
5. At 1:34 P.M. I called again and made the same selection when prompted with the menu of options. I then had to wait on hold for more than thirty (30) minutes before my call was answered. I asked the person who answered how many shelter beds were currently available for adults. They provided the following information: 0 beds available at Higher Ground; 9 beds available at Salvation Army (male only); 22 beds available at Sally’s Place Overnight (women only/overnight only); 4 beds available at Sally’s “Women’s Emergency” (30 day placement); and one bed available at “Women’s Only” (30 day placement).

I declare under penalty of perjury that this declaration is true and correct.

Executed on January 1, 2024, in the City of Minneapolis, County of Hennepin, State of Minnesota, Treaty-Ceded Territory of the Dakota peoples.



Claire Nicole Glenn, Esq.